

BRIAN J. STRETCH (CABN 163973)
Acting United States Attorney

DAVID R. CALLAWAY (CABN 121782)
Chief, Criminal Division

TIMOTHY J. LUCEY (CABN 172332)
Assistant United States Attorney

150 Almaden Boulevard, Suite 900
San Jose, California 95113
Telephone: (408) 535-5054
FAX: (408) 408-5066
Timothy.Lucey@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 15 – 0427 BLF
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER;
v.)	
RAGINI VECHAM, <i>et al.</i> ,)	
Defendants.)	

WHEREAS, the United States and defendants RAGINI VECHAM a/k/a/ Ragini Vechman (“VECHAM”), KISHORE PALLAPOTHU a/k/a Krishna Kishore (“PALLAPOTHU”), SATYANARAYANA TOTA (“TOTA”), and RAMANA REDDY (“REDDY”) are scheduled to appear before the Court for a status hearing on Tuesday, March 21, 2016, in connection with the above-captioned matter;

WHEREAS, lead counsel for the United States is scheduled for official travel out of this District from March 20-23, 2016, in connection with multi-counsel meetings in Washington, D.C., relating to other pending matters, such that he will be unable to appear before this Court as anticipated on March 21, 2016;

1 WHEREAS, defense counsel is continuing to review and evaluate discovery already provided by
 2 the United States in this matter relative to preparing for a further status hearing and setting further dates
 3 before the Court as well as engaging in discussions with the United States relative to the possibility of a
 4 resolution short of trial;

5 WHEREAS, in light of the foregoing, particularly the need for the lead counsel for the United
 6 States to be present before this Court, counsel for the parties jointly agree and stipulate that a
 7 continuance of this matter is appropriate in order to ensure effective preparation of counsel and
 8 continuity of counsel, pursuant to 18 U.S.C. § 3161(h)(7), and that based on their respective calendars
 9 and the period needed for the aforementioned discovery matters, an appropriate date for a status hearing
 10 when counsel for all parties are next available is **Tuesday, April 26, 2016, at 9:00 a.m.,** a date and time
 11 which is also available on this Court's calendar;

12 THEREFORE, the parties also mutually and jointly stipulate that the matter be continued for
 13 defendants VECHAM, PALLAPOTHU, TOTA, and REDDY from March 21, 2016, until April 26,
 14 2016, and further jointly stipulate and agree that time should be excluded from March 21, 2016, up to
 15 and including April 26, 2016.

16 All the parties agree that excluding time until April 26, 2016, is necessary, given the need to
 17 maintain continuity of counsel. The parties also agree that failing to grant a continuance would deny
 18 counsel for the defense the reasonable time necessary for effective preparation and continuity of
 19 counsel, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7). Finally, the
 20 parties agree that the ends of justice served by excluding time from March 21, 2016, up to and including
 21 until April 26, 2016, outweigh the best interest of the public and the defendant in a speedy
 22 trial. *Id.* § 3161(h)(7).

23 **IT IS SO STIPULATED.**

24
 25 DATED: March 16, 2016

/s/ _____
 ETHAN BALOGH
 Attorney for SATYANARAYANA TOTA

1 DATED: March 16, 2016

/s/_____
EDWIN PRATHER
Attorney for RAGINI VECHAM
a/k/a/ Ragini Vechman
and
Attorney for KISHORE PALLAPOTHU
a/k/a Krishna Kishore

6 DATED: March 16, 2016

/s/_____
ISMAIL RAMSEY
Attorney for RAMANA REDDY

9 DATED: March 16, 2016

BRIAN J. STRETCH
Acting United States Attorney

/s/_____
TIMOTHY J. LUCEY
Assistant United States Attorney

15 **IT IS SO ORDERED.**

16 **DATED:**_____

HONORABLE BETH L. FREEMAN
United States District Court